000105394
(JWP-037-99
TWO-033-99)

RMRS Rocky Mountain Remediation Services, L L C
protecting the environment
Rocky Flats Environmental Technology Site
P O Box 464
Golden Colorado 80402 0464
Phone (303) 966 7000

CORRES CONTROL
LTR NO
Originator Ltr Log #
JWP 038 99
) - RF -

DIST	LTR	ENC
CRAWFORD A C		
DINN L A		
DUG D		
HUGHES F P	X	X
JENKINS K		
KRENKO M		
LW J E		
PATTERSON J W		
PEELER M		
SELF K A		
TOUSSARD M C		
TRIS S K		
VANDREW W J		
WERLID T W	X	X
WOUGHN, T L		
WATSON B A		
WILSON, D	X	X
ADMIN RECORDS	X	X
RMRS RECORDS	X	X
OFFIC		
S/T130G		

CLASSIFICATION		
UNI		
CLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

e
REPLY TO RF CC NO

ACTION ITEM STATUS
PARTIAL/OPEN
☐ CLOSED

APPROVALS
Pres
ctor
nager

G & TYPIST INITIALS
WS SLE

>469 (Rev 4/99)

August 13 1999

Alan M Parker
Vice President
Closure Projects Integration
Kaiser-Hill Company, L L C
Building 111

RECEIVED
AUG 17 1999

REQUEST FOR FORMAL DIRECTION - JWP-038-99

Ref (a) J W Patterson ltr to A M Parker, JWP-037-99, Corrective Action Plan for Improved Consistency and Planning of Changes for RMRS Waste Operations Authorization Basis Documents, August 5, 1999
(b) T W Overlid ltr to S K Crowe, TWO-033-99, Identification of Pipe Overpack Containers Containing Residue Waste, April 13, 1999

PURPOSE

The purpose of this letter is to request a response from Kaiser-Hill to the applicable actions delineated in Reference (a)

DISCUSSION

Reference (a) transmitted to Kaiser-Hill the RMRS corrective action plan for improving the consistency and planning of changes for waste operations authorization basis documents Two of the actions in the plan called for RMRS to request the following from Kaiser-Hill

1 Formal direction for pipe overpack containers (POCs) respirable fractions and application in accident analysis

2 Formal guidelines on the definition of consistency and acceptable basis for deviations

Formal direction has not been received from either DOE/RFFO or Kaiser-Hill regarding Item 1 above Although the 1% respirable fraction assumption was used in the most recent 750 Pad and Building 991 AB accident analyses, there was no formal direction requiring this assumption to be applied to other Authorization Basis (AB) documents The reason for not using this assumption in the initial Building 664 Final Safety Analysis Report page change request for POCs was the lack of a defensible technical basis for the 1% respirable fraction assumption as well as a definitive control for its validation This could lead to future AB violations if the 1% respirable fraction assumption is used in the absence of adequate validation In order to facilitate compliance and verification with this requirement, Reference (b) requested Kaiser-Hill action to identify POCs that contain waste generated from the residue stabilization and repackaging process

1/7

Item 2 is required to ensure that Kaiser-Hill expectations for consistency in AB submittals are communicated in a clear and unequivocal manner and to clarify the conditions and criteria for accepting deviations

Accordingly, it is requested that Kaiser-Hill provide formal direction or guidelines on the two items discussed above

RESPONSE REQUIREMENTS
Please respond to the above request Should you have any questions regarding this request, please contact Terry Overlid at extension 4407

James W. Patterson
James W Patterson
Vice President, Technical Support
Rocky Mountain Remediation Services, L L C

DRS sle

cc
Kaiser-Hill
S K Crowe
W A Harding
J C Miller

RMRS Rocky Mountain Remediation Services L L C
[illegible] Kaiser-Hill Environmental Technology [illegible]
[illegible] 8040 [illegible] 016
[illegible] 966 2678
966 8241

ORRES CONTROL LTR NO
Originator Ltr Log #
JWP-037-99
99 - RF ----N/A

DIST	LTR	ENC
CARMEAN C H		
CRAWFORD A C		
FINDLEY M E		
FITZ R C		
QUINN L A		
HERNANDEZ, J		
HUGHES F P	X	X
JAW J E		
McANDREW W J		
OVERLID T W		
PATTERSON J		
VAUGHN T		
WHEELER, M	X	X
WOLF K		
ANDERSON, J L		
BANNISTER, R	X	X
BOWER, J	X	X
CRONIN R. D		
REED A.B		
REINHART W D		
SAUER, P.M.	X	X
SERRANO, O M		
SPROLES W R.		
STACHAWIAK, R.V		
SWANSON D R.	X	X
TUCK, C R.	X	X
THORNTON M D.	X	X
DUREL, M		
O'LEARY G	X	X
RMRS RECORDS	X	X
FILE	X	X
RF CORRES CONTROL		
TRAFFIC		
PATS/T130G		
CLASSIFICATION		
UCNI		
UNCLASSIFIED	X	
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE

Date

IN REPLY TO RF CC NO

ACTION ITEM STATUS

PARTIAL/OPEN CLOSED

LTR APPROVALS

ORIG & TYPIST INITIALS
DRS sku

RF-46469(Rev 1/97)

August 5 1999

Alan M Parker
Vice President
Closure Projects Integration
Kaiser-Hill Company, L L C
Building 111

CORRECTIVE ACTION PLAN FOR IMPROVED CONSISTENCY AND PLANNING OF CHANGES FOR RMRS WASTE OPERATIONS AUTHORIZATION BASIS DOCUMENTS – JWP-037-99

Ref Lowe to Polston ltr , AME ABD TPD 99-03058, dated 8/3/99, subject Disapproval of Building 664 Technical Safety Requirements Page Change to Allow Pipe Overpack Containers with Greater Than 200 Grams Plutonium Equivalent

PURPOSE

The referenced letter disapproved the Building 664 page change which proposed the allowance of Pipe Overpack Containers (POCs) containing in excess of 200g plutonium equivalent into Building 664 RMRS has reviewed this letter and submits the attached action plan to address the issues identified in the reference

DISCUSSION

The above reference identifies deficiencies in the consistency and planning of Authorization Basis submittals As mentioned above, RMRS has reviewed the circumstances that led to the above occurrence and the overall process by which Authorization Basis changes are prepared

The result of this review is the identification of several contributing factors that have led to technical direction provided by DOE/RFFO not being uniformly incorporated into all analyses and analyses not being expeditiously completed and submitted First, there was ineffective communication of expectations relative to technical direction incorporation into AB documents at the Kaiser-Hill and RMRS levels Second, there is a lack of formality in the procedures and guidance documents used in the process of performing Authorization Basis analysis Finally, numerous emergent issues have arisen during the past year that have strained Nuclear Safety resources and funding

In addition to the above the review and approval process between RMRS and Kaiser Hill also lacks the formality necessary to assure timely review and approval of documents

The Corrective Action Plan has been configured to alleviate the existing problems and contains elements necessary for establishing the necessary formality, expedience, and protocol to assure these important documents are properly prepared and processed

RESPONSE REQUIREMENTS
No response required Any questions or comments should be referred to Terry Overlid at extension 4407

J. W. Patterson
James W Patterson
Vice President, Technical Support
Rocky Mountain Remediation Services, L L C

DRS slu

Attachment
As Stated (1)

cc
Kaiser-Hill
W A Harding
S K Crowe
J C Miller

CORRECTIVE ACTION PLAN
FOR
ADDRESSING AUTHORIZATION BASIS CONSISTENCY AND PLANNING ISSUES

#	Cause(s)	Action	Lead	Schedule
A	CONSISTENCY ISSUES			
1	Lack of consistent and formal direction from K-H and DOE	1 Request formal direction from K-H for POC respirable fractions and application in accident analysis 2 Review and formalize guidance (in SARAH) for all parameters and accident scenarios	1 RMRS 2 K H	1 8 13 99 2 Long Term
2	Ineffective communication	1 Formalize expectations to Nuclear Safety staff regarding consistency, quality, and communications with K-H 2 Request formal guidelines from K-H on definition of consistency and acceptable basis for deviations 3 Integrate Building 991 Review Report Items (Appendix C 2) for other facilities	1 Swanson 2 RMRS 3 K H	1 8 13 99 2 8 13 99 3 8 31 99
3	Inconsistencies in AB submittals	Develop prestart checklist to assure consistent methodology for all AB evaluations	Swanson	8 19 99
4	Inconsistencies caused by facility or activity differences	Identify and justify deviations from accepted methods and assumptions in letter transmittals to K-H	Swanson	Ongoing
B	PLANNING/TIMELINESS ISSUES			
1	Funding not sufficient for comprehensive AB support of waste operations	Define FY00 funding requirements for AB support	Tuck O Leary Swanson	8 31 99
2	Insufficient Nuclear Safety staff resources for ongoing AB development/maintenance and to address emergent issues	1 Submit requisition for additional FY00 Nuclear Safety staff positions 2 Identify protocol for assignment of personnel to emergent nuclear safety issues Solicit input from operational organizations to assist in such assignment and appropriate means of resource identification	1 Overlid 2 Overlid	1 9-30 99 2 10 31 99
3	Compressed preparation review and approval cycle	Develop generic timelines for submittal and approval of AB documents and promulgate within RMRS	Overlid Lea Miller (concurrence	30 99
4	Inadequate AB planning and support for waste operations and TRU projects and schedules	Institute biweekly project priority schedule commitment, and status meeting between Nuclear Safety K-H and Solid Waste Operations/TRU Projects	Swanson Tuck O Leary Miller	8 7 99

RMRS Rocky Mountain Remediation Services, L L C
protecting the environment
Rocky Flats Environmental Technology Site
P O Box 464
Golden Colorado 80402 0464
Phone (303) 966 7000

April 13, 1999

CORRES CONTROL
LTR NO
Originator Ltr Log #
TWO-033-99

DIST	LTR	ENC
CARMEAN, C H		
CRAWFORD, A.C		
FINDLEY, M E.		
FITZ, R.C.		
GUINN, L.A.		
HUGHES F P	X	
LAW, J E.		
OVERLID T W		
PATTERSON J	X	
WHEELER, M	X	
BROUSSARD, M		
ELLIS, S K.		
REED, A.B		
REINHART, W D		
[illegible], D R.	X	
[illegible]N, J R.		
[illegible]N, B. A.		
BOWER, J M.	X	
DUNN, R. P		
SAUER, P M	X	
SENNA J M.		
RMRS RECORDS	X	
FILE	X	
RF CORRES CONTROL		
TRAFFIC		
PATS/T130G		
CLASSIFICATION		
UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE

Date

IN REPLY TO RF CC NO

ACTION ITEM STATUS

L/OPEN CLOSED

LTR APPROVALS

ORIG. & TYPIST INITIALS
MW

RF-46469(Rev 1/97)

S K Crowe
Closure Projects Engineering & Integration
Kaiser-Hill Company, L L C
Building 130

IDENTIFICATION OF PIPE OVERPACK CONTAINERS CONTAINING RESIDUE WASTE - TWO-033-99

Ref (1) *Evaluation of Airborne Release Fractions and Respirable Fractions in Use at RFETS for Analysis of Radiological Fire Consequences*, J Mishima, T Foppe, July 29, 1998

Ref (2) *POC Respirable Fraction*, correspondence from T Foppe to D Swanson, W Horton, S Walker-Lembke, V Peterson, S Olinger, and M Payne, dated November 30, 1998

PURPOSE

The purpose of this correspondence is to request that Kaiser-Hill arrange a meeting with representatives from Kaiser-Hill, RMRS, and applicable SSOC program(s) to discuss the need to identify POCs that contain waste generated from the residue stabilization and repackaging process

DISCUSSION

There is a need for identifying Pipe Overpack Containers (POCs) that are generated via the residue stabilization and repackaging process The safety analysis supporting POC storage on the 750 Pad (in Tents 2 and 12) assumes that the POCs contain only transuranic (TRU) and transuranic mixed (TRU-M) waste generated from the residue stabilization and repackaging process with a representative bounding 1% respirable fraction (RF) Other potential waste packaged in POCs where the 1% RF may not be justified are not allowed to be staged or stored on the 750 Pad (e g , decontamination and decommissioning-generated, high americium TRU/TRU-M waste)

All of the current and projected item description codes (IDCs) associated with the residue stabilization and repackaging process were included in a statistical analysis of measured particle size data (e g , the RFETS Residue Characterization database), Ref 1 In correspondence from DOE-RFFO, Ref 2, it was recommended that a representative bounding RF of 1% be assumed for residue wastes

6

The 750 Pad Facility Management requires verification from the shipper that incoming POCs are compliant with Limiting Condition for Operation (LCO) 4 3 3 of the FSAR (i e , that the waste was generated from the residue stabilization and repackaging process and by default meets the 1% RF requirement) In order to facilitate compliance and verification with this requirement, RMRS Nuclear Safety recommends that the Residue Stabilization and Repackaging Program identify POCs that are (and have been) repackaged with waste from the residue stabilization and repackaging process

One possible option is developing a simple database that identifies these POCs by container number The database could utilize the same software and network as the Waste and Environmental Management System (WEMS), with database modification and maintenance restricted only to select personnel associated with the residue stabilization and repackaging process This would enable the 750 Pad Facility Management to access the database in a read only format to verify whether the incoming waste in POCs was generated from the residue stabilization and repackaging process and by default meet the 1% RF requirement Because no other groups would have database modification privileges, any other waste (e.g , generic TRU/TRU-M with higher RFs) packaged into POCs in the future would not be reflected in the database Therefore this waste could be differentiated as not being generated from the residue stabilization and repackaging process. There is a need to make this distinction regardless of the method chosen to identify the POCs

RESPONSE REQUIREMENT
No response required If you have questions or comments, please contact Don Swanson at extension 7009 or pager 212-5654

T W Overlid
Director, Nuclear Safety
Rocky Mountain Remediation Services, L L C

DRS man

Enclosure
N/A

cc
Kaiser-Hill
H E Gilpin
J C Miller

Tenera
S Walker-Lembke

1/1